

Alexandria Division

Defendants.

Civil Action No. 1-15-CV-1581

Plaintiff requests this additional time due to the high number of motions which require his response (four total). In addition, counsel for plaintiff, J. Cathryne Watson, will be away from the office and out of town on pre-scheduled travel the week of February 12-17, 2017. Moreover, plaintiff has demonstrated a cooperative attitude with defendants on such matters, by agreeing to their request to extend the deadline to respond to plaintiff's Complaint to February 7, 2017.

A hearing on defendants' motions is currently scheduled for March 24, 2017. As such, it is believed the requested extension to March 7, 2017 for plaintiff to file response briefs will allow ample time for defendants to file replies thereto (if any) in advance of the hearing, as the deadline for any such replies would be March 13, 2017, pursuant to Local Civil Rule 7(F)(2).

Defendants Raymond Roberts, Thanh Quach, John T. Curtis, Debra Parker Curtis, Zachary Casagrande, and Gena Casagrande have given consent to this motion via electronic mail from their counsel to plaintiff's counsel. Plaintiff's counsel has requested consent for this motion from defendants Donald Berlin and Kimberly Berlin via electronic mail to their counsel, but as of this filing, plaintiff's counsel has not received a response.

Respectfully submitted,

/s/

J. Cathryne Watson
Virginia Bar No. 79186

/s/

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 8, 2017, I caused a copy of the foregoing Motion for Enlargement of Time to Respond to Motions to Dismiss to be served via electronic filing upon:

Robert R. Veith, Esq. Hirschler Fleischer 8270 Greensboro Drive, Suite 700 Tysons, VA 22102 rveith@hf-law.com (Counsel for Defendants John and Debra Curtis)	J. Travis Pittman, Esq. Oster Law Firm 1850 M Street, N.W., Suite 280 Washington, D.C. 20036 travis@osterlawfirm.com
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David C. Gutkowski, Esq. Odin Feldman Pittleman, P.C. 1775 Wiehle Avenue, Suite 400 Reston, VA 20190 david.gutkowski@ofplaw.com (Counsel for Defendants Zachary and Gena Casagrande)	John D. McGavin, VSB No. 21794 BANCROFT, McGAVIN, HORVATH & JUDKINS 9990 Fairfax Boulevard, Suite 400 Fairfax, Virginia 22030 Telephone: (703) 385-1000 Facsimile: (703) 385-1555 jmcgavin@bmhlaw.com (Counsel for Defendants Donald Berlin and Kimberley L. Berlin)

/s/
J. Cathryne Watson

**UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

)	
CLIFFORD THOMAS,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1-15-CV-1581
)	
RAYMOND ROBERTS, et al.,)	
)	
Defendants.)	
)	

ORDER

This matter is before the Court on Plaintiff Cliff Thomas's Consent Motion for Enlargement of Time to Respond to Motions to Dismiss. Upon consideration and for good cause shown, the Court finds that the Motion should be GRANTED.

ACCORDINGLY, it is hereby

ORDERED, that the time for Plaintiff Cliff Thomas to respond to defendants' motions filed on February 7, 2017 be, and hereby is, extended to and including March 7, 2017.

DONE and ORDERED this ____ day of February, 2017.

United States District Judge